

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

**REMBRANDT WIRELESS
TECHNOLOGIES, LP**

Plaintiff,

V.

**SAMSUNG ELECTRONICS CO. LTD.;
SAMSUNG ELECTRONICS
AMERICA, LLC; SAMSUNG
TELECOMMUNICATIONS
AMERICA, LLC; SAMSUNG AUSTIN
SEMICONDUCTOR, LLC;
RESEARCH IN MOTION CORP. and
RESEARCH IN MOTION, LTD.**

Defendants.

Civil Action No. 2:13-CV-213

JOINT MOTION TO EXTEND THE FACT DISCOVERY DEADLINE

Plaintiff Rembrandt Wireless Technologies, LP (“Rembrandt”) together with Samsung Co., Ltd., Samsung Electronics America, Inc., Samsung Telecommunications America, LLC, Samsung Austin Semiconductor, LLC (“Samsung”), BlackBerry Corp., and BlackBerry Ltd. (“BlackBerry”) jointly come before this Court and asks that the Docket Control Order (Docket No. 53, as amended by Docket Nos. 140 and 145) be amended as listed below. The requested change will not affect any other deadlines in the Docket Control Order (“DCO”).

Amended Deadline	Current Deadline	Event
Nov. 6, 2014	Oct. 23, 2014	Deadline to Complete Outstanding Fact Discovery and File Motions to Compel Discovery related to Outstanding Fact Discovery

Parties have previously filed a Joint Motion to Extend the Fact Discovery Deadline with respect to “Outstanding Fact Discovery” issues (Docket No. 139), which the Court granted (Docket No. 140). The present request is made for the purpose of allowing discovery, solely with respect to the following:

- Amended document authentication and/or business records declarations from third-parties, including: CSR Technology Inc., Texas Instruments, Inc., Broadcom Corp., Qualcomm Inc., IEEE, and Intel Corp. In particular, these third parties have made supplemental document productions in this litigation after the original declarations were executed. Rembrandt has been working diligently to obtain the amended declarations, but third parties need additional time to finalize them.
- Stipulation with Samsung relating to certain damages issues. In particular, in lieu of a deposition on certain financial topics, including chip pricing, unit sales, and financial statements, Samsung has agreed to provide a stipulation. Rembrandt and Samsung have been diligently working to finalize the stipulation agreement, but need additional time.
- A stipulation between the parties in lieu of a deposition of non-party ARRIS Group, Inc., or a deposition of ARRIS Group, Inc. The parties have been working diligently to finalize the stipulation, but need additional time.

A proposed order that complies with the Court’s requirements is attached.

DATED: October 24, 2014

Respectfully submitted,

By: /s/ Kyril Talanov
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**Attorneys for Defendants/Counterclaim
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CERTIFICATE OF SERVICE

I hereby certify that the following was served to all counsel of record via CM/ECF on October 24, 2014.

/s/ Kyril Talanov _____

Kyril Talanov

CERTIFICATE OF CONFERENCE

I hereby certify that prior to filing this motion, counsel for Rembrandt conferred with counsel for Defendants Samsung and Blackberry regarding this Motion on October 23, 2014 in accordance with Local Rule CV-7(h). This is a joint motion; it is unopposed.

/s/ Kyril Talanov _____

Kyril Talanov

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